

In the United States Court of Federal Claims

IN RE UPSTREAM ADDICKS AND
BARKER (TEXAS) FLOOD-CONTROL
RESERVOIRS

Sub-Master Docket
No. 17-9001 L

HIS DOCUMENT APPLIES TO:

Joshua Mumba, et al
v.
The United States
Case No. 17-1582 L

PLAINTIFFS' INITIAL DISCLOSURES

Plaintiffs by and through their undersigned counsel of record, hereby furnish the following information pursuant to Rule 26(a)(1)(A) of the Rules of the Court of Federal Claims:

Rule 26(a)(1)(A)(i): The name, and if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Response:

A. Plaintiffs

Lilia Agard
7230 Round Rock Park Lane
Richmond, TX 77407
832-455-3760
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Ryan Agard
7230 Round Rock Park Lane
Richmond, TX 77407

832-455-3757

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Samuel T. Albert

7014 Angel Oaks Court

Richmond, TX 77407

832-971-8403

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Olufemi Allen-Taylor

18123 Emerybrook Court

Richmond, Tx 77407

713-503-9090

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Carlos D. Altamirano

17955 Coldale Glenn Lane

Richmond, TX 77407

281-528-3794

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Jose Luis Alvarado

18107 Bluefield Lane

Richmond, TX 77407

832-520-4905

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Maria Del Rosario Alvarado
18107 Bluefield Lane
Richmond, TX 77407
713-253-7281
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Wainna Ashton
18226 Brightwood Park Lane
Richmond, TX 77407
281-730-6914
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Ana Beiza
17922 Coldale Glen Lane
Richmond, TX 77407
832-431-7491
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Lanetta Berry
7114 Autumn Bluff Lane
Richmond, TX 77407
713-703-6595
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750

Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

David E. Browne
7010 Oak Prairie Court
Richmond, TX 77407
281-513-9580
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Rebeca R. Cabral
18130 Flower Grove Court
Richmond, TX 77407
832-520-0598
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Helena Cagliano
18103 Red Ash Court
Richmond, TX 77407
832-390-7640
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Maria Cagliano
17407 Poplar Canyon Court
Richmond, TX 77407
713-504-0227
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080

713-751-3058 (Facsimile)

Ludivina L. Campos
18102 Bluefield Lane
Richmond, TX 77407
832-718-2963

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Katy Cantu
17327 Canton Forest
Richmond, TX 77407
832-245-3679

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Xavier Carrillo
18107 Red Ash Court
Richmond, TX 77407
713-428-1152

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

David Cathart
7307 Eden Crossing Lane
Richmond, TX 77407
713-478-7580

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Ivory Cheeks, Sr.
18006 Oak Collage Court
Richmond, TX 77407
713-550-4963
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Lilian Chinedo
7419 Colby Run Court
Richmond, TX 77407
713-540-6120
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Muhammad Chowdhury
18114 Crestglen Court
Richmond, TX 77407
845-405-6339
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Nurunnahar B. Chowdhury
18114 Crestglen Court
Richmond, TX 77407
845-405-6339
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Trina Massie Coleman
18227 Spring Run Lane

Richmond, TX 77407
832-278-5588
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Shawn Coleman
18227 Spring Run Lane
Richmond, TX 77407
713-836-8227
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

William Dadson
18107 Emerybrook Court
Richmond, TX 77407
832-265-2144
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Janet Freeny Dunlap
18126 Flower Grove Court
Richmond, TX 77407
832-489-5664
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)
512-330-0252

Evelyn Ebonka
18010 Oakmoss Hill Court
Richmond, TX 77407

832-661-7865

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Jacqueline L. Ewing

7326 Autumn Bluff Lane

Richmond, TX 77407

281-682-6692

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Christiana A. Ezema

7302 Round Rock Park Lane

Richmond, TX 77407

832-661-5344

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Guy Falen

6714 Oakleaf Trail Lane

Richmond, TX 77407

713-291-4153

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Maria Falen

6714 Oakleaf Trail Lane

Richmond, TX 77407

713-291-4153

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Sara Fazal
6710 Oakleaf Trail Lane
Richmond, TX 77407
832-436-8144
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Eddie E. Flores
6618 Halloway Square Lane
Richmond, TX 77407
832-282-9957
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Jennifer Flores
6611 Forest Mill Lane
Richmond, TX 77407
713-876-9708
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Nancy Fuentes
18114 Bluefield Lane
Richmond, TX 77407
832-343-0700
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750

Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Paul Givens
18003 Oakwind Court
Richmond, TX 77407
832-863-6014
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Terence B. Gomes
18011 Oak Moss Hill Court
Richmond, TX 77407
281-536-2872
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Araceli Gomez
18123 Flower Grove Court
Richmond, TX 77407
345-253-6384
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Emma Gomez
18103 Bluefield Lane
Richmond, TX 77407
832-668-4579
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080

713-751-3058 (Facsimile)

Marilyn Gray
18002 Oak Cottage Court
Richmond, TX 77407
281-639-4309
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Sena Gutema
17918 Coldale Glen Lane
Richmond, TX 77407
503-267-4454
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Larry Hall
18147 Afton Hollow Lane
Richmond, TX 77407
713-816-1941
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Lucille Hall
18147 Afton Hollow Lane
Richmond, TX 77407
713-816-1941
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Marie Helms
18135 Flower Grove Court
Richmond, TX 77407
281-704-5601
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Norman E. Helms
18135 Flower Grove Court
Richmond, TX 77407
281-705-9456
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Omar Hernandez
7803 Silent Timber Lane
Richmond, TX 77407
281-513-4211
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Tania Hoggard
17906 Camden Oaks Lane
Richmond, TX 77407
832-578-4021
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)
512-330-0252

Edna Uche Igodan

18111 Bluefield Lane
Richmond, TX 77407
832-891-9151

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

David Ihidero
7226 Wimberly Oaks Lane
Richmond, TX 77407
832-656-5099

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Christine Ingram
7014 Sugar Oaks Court
Richmond, TX 77407
281-704-9409

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Abdoulie Jallow
18115 Mayfield Meadow Lane
Richmond, TX 77407
757-582-4717

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Abadu Jebeasae
18451 Austin Oak Lane
Richmond, TX 77407

832-677-5503

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Frederick Johnson

7802 Hollow Bluff Lane

Richmond, TX 77407

832-577-6163

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Tonia L. Johnson

7110 Autumn Bluff Lane

Richmond, TX 77407

832-752-6300

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Lizanne N. Jones

7307 Eden Crossing Lane

Richmond, TX 77407

713-478-7580

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Lara, Scarlett

7326 Wimberly Oaks Lane

Richmond, TX 77407

832-863-2352

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Philomena D. Lawson
17822 Oakridge Canyon Lane
Richmond, TX 77407
832-474-2030
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Noe Leiva
7810 Talladega Spring Lane
Richmond, TX 77407
832-469-0566
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Denise Lloyd
7630 Village Mill Lane
Richmond, TX 77407
281-658-9972
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Henry Lloyd
7630 Village Mill Lane
Richmond, TX 77407
281-658-9972
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750

Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Tammy Lo
18014 Barton Ridge Lane
Richmond, TX 77407
832-638-2770
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Jaime Loaiza
7242 Autumn Bluff Lane
Richmond, TX 77407
713-791-2158
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Joanne Lockhart
18118 Crestglen Court
Richmond, TX 77407
281-932-3886
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Wayne Lockhart
18118 Crestglen Court
Richmond, TX 77407
281-932-3886
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080

713-751-3058 (Facsimile)

Joe Martinez
17919 Golden Canyon Lane
Richmond, TX 77407
713-538-4415
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Norma Martinez
17919 Golden Canyon Lane
Richmond, TX 77407
713-538-4415
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Maggie Martinez
7335 Eden Crossing Lane
Richmond, TX 77407
281-673-5226
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

McPherson, Patricia
18115 Emerybrook Court
Richmond, Texas 77407
832-877-2877
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Omatayo Michael-Anubi
17902 Camden Oaks Lane
Richmond, TX 77407
281-685-5961
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Laverne Mitchell
18111 Oakfield Crossing
Richmond, TX 77407
281-714-8381
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Fabiola Molina
18135 Brightwood Park Lane
Richmond, TX 77407
281-794-6615
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Cyril Molokwu
18147 Mayfield Meadow Lane
Richmond, TX 77407
281-221-3595
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Joshua M. Mumba
7906 Linden Oaks Lane

Richmond, TX 77407
817-455-6431
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

John Naseri
7342 Eden Crossing Lane
Richmond, TX 77407
832-640-2965
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Syed Nasir
18143 Mayfield Meadow Lane
Richmond, TX 77407
832-277-0862
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Santos Navarro
7518 Northfork Hollow Way
Richmond, TX 77407
281-236-3198
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)
512-330-0252

Maduka Nkuku
17507 Heath Grove Lane
Richmond, TX 77407

832-715-7239

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Chuma Okoli

6702 Oakleaf Trail Lane

Richmond, TX 77407

713-291-9456

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Ndubueze Onwuchuruba

7811 Silent Timber Lane

Richmond, TX 77407

832-656-5403

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Tanya Onwuchuruba

7811 Silent Timber Lane

Richmond, TX 77407

832-656-5403

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Stephen B. Owusu

18111 Red Ash Court

Richmond, TX 77407

832-600-4027

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Cynthia A. Pantoja
18123 Oakleaf Trial Court
Richmond, TX 77407
281-277-7862
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Daniel Pantoja
18123 Oakleaf Trial Court
Richmond, TX 77407
281-277-7862
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Marbella Pastrana
18218 Brightwood Park Lane
Richmond, TX 77407
713-505-7278
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Frank Perez
7202 Autumn Bluff Lane
Richmond, TX 77407
713-254-0984
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750

Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Linh An Phan
18110 Bluefield Lane
Richmond, TX 77407
713-301-6092
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Phoung Phan
18110 Bluefield Lane
Richmond, TX 77407
713-301-6092
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Yolanda Phillips
17951 Coldale Glen Lane
Richmond, TX 77407
832-836-6727
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Mark Pierce
18007 Oakwind Court
Richmond, TX 77407
281-253-4804
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080

713-751-3058 (Facsimile)

Edward Polk
18211 Mayfield Meadow Lane
Richmond, TX 77407
832-520-3093
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Sandra Portillo
7246 Autumn Bluff Lane
Richmond, TX 77407
281-745-4656
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Wilfredo Portillo
7246 Autumn Bluff Lane
Richmond, TX 77407
281-745-4656
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Charles Redd
7015 Angel Oaks Court
Richmond, TX 77407
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Mary Redd

7015 Angel Oaks Court
Richmond, TX 77407
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

John Rendon
17703 Scenic Oaks Drive
Richmond, TX 77407
281-974-9923
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Johnnie M. Richardson
6630 Forest Mill Lane
Richmond, Texas 77407
281-768-1416
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Jose Luis Rodriguez
17922 Coldale Glen Lane
Richmond, TX 77407
832-431-7491
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)
512-330-0252

Lucila Rodriguez
7639 Village Mill Lane
Richmond, TX 77407

281-467-7277

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Rodriguez, Miguel
7703 Silent Timber
Richmond, TX 77407
281-253-6931

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Michael Samia
18110 Crestglen Court
Richmond, TX 77407
832-618-6021

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Vivian Samia
18110 Crestglen Court
Richmond, TX 77407
832-618-6021

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Aida Santos
17619 Magnolia Circle
Richmond, TX 77407
907-321-5247

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Jose Santos
17619 Magnolia Circle
Richmond, TX 77407
907-321-5247
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Shana Sellew
18115 Oakleaf Trail Court
Richmond, TX 77407
225-603-1520;
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Niranjan Sharma
17943 Golden Canyon Lane
Richmond, TX 77407
281-409-9070
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Anis A. Siddiqui
7126 Autumn Bluff Lane
Richmond, TX 77407
713-584-7936
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750

Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Maria Ines Sierra
7918 Talladega Springs Lane
Richmond, TX 77407
832-868-3470
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Susan Smyers
7226 Autumn Bluff Lane
Richmond TX 77407
832-457-1539
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Damola Somame
18238 Brightwood Park Lane
Richmond, TX 77407
713-598-1537
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Mojisola Somame
18238 Brightwood Park Lane
Richmond, TX 77407
713-598-1537
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080

713-751-3058 (Facsimile)

Donald Strickland
7002 Angel Oaks Court
Richmond, TX 77407
281-682-6261

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Amir Subotic
18122 Crest Glen Court
Richmond, TX 77407
281-743-0535

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Lashon Sullivan
17826 Oakridge Canyon Lane
Richmond, TX 77407
832-334-9974

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Miriam Tapia
17930 Golden Canyon Lane
Richmond, TX 77407
832-477-6539

c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Paul Phy Duy Tran
7626 Brighton Knolls Lane
Richmond, TX 77407
713-557-2919
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Quyen Tran
17907 Golden Canyon Lane
Richmond, TX 77407
832-419-6328
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Trinh Tran
17911 Golden Canyon
Richmond, TX 77407
832-273-6893
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Shonette Jackson Uneh
7306 Eden Crossing Lane
Richmond TX 77407
832-258-2808
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Stanley Uneh
7306 Eden Crossing Lane

Richmond TX 77407
832-258-2808
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Jose Ventura
18115 Bluefield Lane
Richmond, TX 77407
281-509-3234
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

Jacques Washington
6818 Grape Vine Trail
Richmond, TX 77407
281-896-1454
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)

David Wersler
17306 Harvest Hollow Court
Richmond, TX 77407
281-851-8276
c/o Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
3 Riverway, Suite 750
Houston, Texas 77056
713-751-3080
713-751-3058 (Facsimile)
512-330-0252

Errol Anthony Wilks
6706 Oakleaf Trail Lane
Richmond, TX 77407

832-651-5334

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Tammie Woolbright

18118 Afton Hollow Lane

Richmond, TX 77407

832-368-9994

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Amin Zeerak

18211 Spring Run Lane

Richmond, TX 77407

832-788-4190

c/o Jared R. Woodfill (lead attorney)

Fed. No. 17069; Texas Bar No. 00788715

3 Riverway, Suite 750

Houston, Texas 77056

713-751-3080

713-751-3058 (Facsimile)

Knowledge of the date of purchase of each Plaintiffs' respective property, the pre-flood condition of each Plaintiffs' respective property, the extent and timing of each Plaintiffs' flooding damages, as well as knowledge of the costs, effort, and timeline of the rehabilitation and repair of each Plaintiffs' respective Property.

B. USACE

Col. Lars N. Zetterstrom

Capt. Charles Ciliske

Andrea Murdock-McDaniel

Robert Howell, P.E.

Richard K. Long

Dr. Edmond Russo

Mario Beddingfield, P.E.

Michael Sterling, PhD, PE, PMP

Robert C. Thomas

Coraggio Maglio, PE, CFM
Charles Scheffler
Michael Kauffman
Tim Clarkin
Michael Garske
Russell Errett
Pete G. Perez
Michael Zalesak
Michael Southern
Joseph Hrametz
Dwayne Johnson
Karl Brown
Lori Thomas
Gary Chow
Terry Bautista
Fred Jensen
Theodore Kerr
Donovan Ollar
Randy Cephus
c/o 2000 Fort Point Road
Galveston, Texas 77550
(409) 766-3899

Aaron Byrd
c/o 3909 Halls Ferry Road
Vicksburg, Mississippi 39180
(601) 634-3188

Knowledge of the design, capacities, operations, condition, and guiding regulations and practices associated with Addicks and Barker Reservoirs in general, and as to the actions relating to Tropical Storm Harvey in particular.

C. Harris County Flood Control District

Jeff Lindner
Steve Fitzgerald
c/o 9900 Northwest Freeway
Houston, TX 77092
(713) 684-4000

Knowledge of rainfall and flooding relating to Tropical Storm Harvey.

Plaintiffs also adopt and incorporate the names and contact information for the individuals listed or referenced in the documents identified below, all of whom may have knowledge regarding

Plaintiffs' claims and defenses including the history, construction, and operations of the Addicks and Barker Reservoirs, as well as anticipated water flows, collection capacities, design parameters, and performance of the reservoirs and operations personnel during various significant rainfall events, including Tropical Storm Harvey. As there may be other individuals with knowledge whose identity may be determined as the parties proceed through the discovery process, Plaintiffs reserve the right to identify additional persons who may have discoverable information to support their claims or defenses at a later time.

Rule 26(a)(1)(A)(ii): A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Response:

A. Items in the custody or control of Plaintiffs:

1. Indicia of the Plaintiffs' ownership of the property in question, including, but not limited to, documents sufficient to show the original purchase date and ownership by each of the above-described Plaintiffs of the properties made subject of this action.
2. Photos of the of the above-described Plaintiffs' property before, during, and after the inundation of the above-referenced Plaintiffs' property resulting from the authorized actions of the USACE.
3. Documents sufficient to establish the value of the damaged properties and the damaged contents of the properties.
4. Materials related to additional living expense incurred by the above-referenced Plaintiffs resulting from the above-referenced inundation.

B. U.S. Army Corps of Engineers

1. Definite Project Report – Buffalo Bayou, Texas (Jun. 1940)
2. Water Control Manual (Apr. 1962)
3. Hydrology Report (Aug. 1977)
4. ER1110-2-1451 Acquisition of Lands Downstream from Spillways for Hydrologic Safety Purposes (Aug. 1978)
5. Flood Emergency Plans Guidelines for Corps Dams (Jun. 1980)
6. Environmental Assessment – Addicks and Barker Dams (Nov. 1981)
7. ER 1165-2-119 Modifications to Completed Projects (Sep. 1982)

8. ER 1165-2-26 Implementation of Exec. Ord. 11988 on Flood Plain Management (Mar. 1984)
9. Dam Safety Assurance – General Design Memorandum (June 1984)
10. Dam Safety Assurance – Supplement No. 1 to General Design Memorandum (Dec. 1985)
11. Master Plan Update – Addicks and Barker Reservoirs (June 1986)
12. ER 1110-8-2 FR Inflow Design Floods for Dams and Reservoirs (Mar. 1991)
13. EM 1110-2-1603 Hydraulic Design of Spillways (Aug. 1992)
14. EM 1110-2-1619 Risk-Based Analysis for Flood Damage Reduction Studies (Aug. 1996)
15. ER 1130-2-530 Flood Control Operations and Maintenance Policies (Oct. 1996)
16. ER 1110-2-1155 Dam Safety Assurance Program (Sep. 1997)
17. ER 500-1-1 Civil Emergency Management Program (Sep. 2001)
18. Galveston District Emergency Operations Plan (Aug. 2006)
19. Annex I (Addicks & Barker Emergency Action Plan) to Emergency Operations Plan (2006)
20. Draft Statistical Analysis of Reservoir Pool Elevations (Dec. 2008)
21. 2009 Master Plan – Addicks and Barker Reservoirs (August 2009)
22. Final Environmental Assessment for 2009 Master Plan (August 2009)
23. EC1165-2-210 Water Supply Storage and Risk Reduction Measures for Dam Safety (Apr. 2010)
24. Interim Reservoir Control Action Plan (Jul. 2010)
25. Environmental Assessment re: Seg. E of Grand Pkwy (Jun. 2011)
26. Addicks and Barker Dams and Reservoirs Flood Release Procedures (Jun. 2011)
27. ER 1110-2-1156 Safety of Dams -- Policy and Procedures (Oct. 2011)
28. Draft Environmental Assessment Addicks and Barker Dam Safety Modification (Oct. 2012)
29. Water Control Manual (Nov. 2012)
30. Project Review Plan for Addicks and Barker Dams (Dec. 2012)
31. Review Plan for Addicks and Barker Dams – PED & Construction Activities (Nov. 2013)
32. Addicks Reservoir – Watershed Effects from Past, Present and Future Conditions (Nov. 2013)
33. ER 1110-2-1156 Safety of Dams -- Policy and Procedures (Mar. 2014)
34. HEC-HMS Basin and Meteorologic Model Descriptions (Jun. 2014)
35. Addendum to EA re: Seg. E of Grand Pkwy (2014)
36. Annex I (Addicks & Barker Emergency Action Plan) to Emergency Operations Plan (2014)
37. Dam Safety Update – Addicks and Barker (ppt) (Mar. 9 2016)

38. EM 1110-2-240 Engineering and Design Water Control Management (May 2016)
39. ER 1105-2-101 Risk Assessment for Flood Risk Management Studies (Jul. 2017)
40. EM 1110-2-3600 Management of Water Control Systems (Oct. 2017)
41. USACE Press Releases (2016-2017)
42. Documents reflecting flowage and/or inundation easements owned by the USACE adjacent to the Addicks and Barker Dams produced in response to FOIA No. FA-17-0282 (various dates)
43. Documents produced in response to FOIA No. FA-18-0047 (various dates)
44. Video of Richard Long Canyon Gate Interview (Sep. 2017)

C. Harris County Flood Control District

1. Addicks Reservoir Watershed Management Study – Ph I (March 1991)
2. Addicks Reservoir Watershed Management Study- Ph II (April 1992)
3. Katy Freeway Corridor Flood Control Study (May 1996)
4. Stage Frequency Analyses for Addicks and Barker (1998)
5. Effects of Urban Development on Inflows and Reservoir Stages (1999)

D. Federal Emergency Management Agency

1. Flood Insurance Study for Harris County (1992)
2. Flood Insurance Study for Harris County (2000)
3. Federal Guidelines for Dam Safety – Emergency Action Planning for Dam Owners (Apr. 2004)
4. Flood Insurance Study for Harris County (2007)
5. Selecting and Accommodating Inflow Design Floods for Dams (Aug. 2013)
6. Flood insurance Study for Harris County (2013)
7. Flood insurance Study for Harris County (2014)
8. Flood insurance Study for Harris County (2015)
9. Flood insurance Study for Harris County (2017)
10. Flood Insurance Study for Waller County (2009)
11. Flood Insurance Study for Fort Bend County (2001)
12. Flood Insurance Study for Fort Bend County (2014)

E. Data

1. United States Geological Survey: streamflow, reservoir levels and precipitation data
2. Harris County: flood, streamflow and precipitation data
3. National Weather Service: Precipitation and wind data
4. Harris County Appraisal District: real property records
5. Fort Bend County Appraisal District: real property records
6. Aerial and LIDAR imagery for Harris and Fort Bend Counties

As discovery progresses, Plaintiffs reserve the right to identify additional documents and things that they may use to support their claims or defenses. Plaintiffs also reserve the right to supplement and amend this disclosure as more information becomes available through further investigation or discovery or if the Complaint is amended.

Rule 26(a)(1)(A)(iii): A computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under RCFC 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Response:

In general terms, Plaintiffs' damages are equal to the value of their real and personal property that was taken. The exact computation of the quantum of damages will be provided as soon as the requisite information is available to the above-described Plaintiffs, and is to be provided in accordance with an applicable scheduling order.

In addition, Plaintiffs seek all recoverable costs under federal law, including, but not limited to, court costs, attorneys' fees, appraisal, and engineering fees.

Plaintiffs reserve the right to supplement and amend this disclosure as more information becomes available through further investigation or discovery or if the Complaint is amended.

Houston, Texas
December 15, 2017

Respectfully submitted,

Woodfill Law Firm, P.C.

/s/ Jared R. Woodfill

Jared R. Woodfill (lead attorney)
Fed. No. 17069; Texas Bar No. 00788715
woodfillservice@gmail.com (service email)
3 Riverway, Suite 750
Houston, Texas 77056

713-751-3080
713-751-3058 (Facsimile)

Lill Firm, P.C.
David S. Lill
Texas Bar No. 12352550
4407 Bee Cave Road #111
Austin, Texas 78746
512-330-0252
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing disclosures was served upon the following counsel for Defendant by U.S. Mail on December 15, 2017.

Jeffrey H. Wood
Jacqueline C. Brown
Laura W. Duncan
Sarah Ifzar
United States Department of Justice
Environment & Natural Resources Division
P.O. Box 7611
Washington, D.C. 20044-7611

By: /s/ Jared R. Woodfill
Jared R. Woodfill